

November 13, 2003

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: **NOTICE OF EX PARTE PRESENTATION**
Establishment of Rules and Policies for the Satellite Digital Audio Radio
Service in the 2310-2360 MHz Band, IB Docket No. 95-91

Dear Ms. Dortch:

On November 12, 2003, representatives from Verizon Communications, Inc., BellSouth Corp., XM Satellite Radio, Inc. ("XM"), Sirius Satellite Radio, Inc. ("Sirius"), Carl Frank, Counsel to Sirius Satellite Radio, Bruce Jacobs, counsel to XM Satellite Radio, William Wiltshire counsel to AT&T Wireless Services, Inc. ("AT&T"), and the undersigned, representing the Wireless Communications Association International, Inc. ("WCA"), met with several individuals from the Office of Engineering and Technology, the International Bureau and the Wireless Telecommunications Bureau regarding the pending *Notice of Proposed Rulemaking* in the referenced proceeding that will propose new rules to govern the use of terrestrial repeaters by Satellite Digital Audio Radio Systems ("SDARS").

The participants discussed the status of the ongoing negotiations between the SDARS licensees and the Wireless Communications Service ("WCS") licensees to develop potential rules that would effectively permit both the SDARS licensees and the WCS licensees to deploy communications systems without harmful interference. The participants also discussed a timeline by which the negotiations should conclude. Attached hereto is a copy of the materials presented at the meeting jointly by the SDARS and WCS licensees and a list of all attendees.

Should you have any questions regarding this presentation, please contact the undersigned.

Respectfully submitted,

WILKINSON) BARKER) KNAUER) LLP

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/s/ Mary N. O'Connor

Mary N. O'Connor

List of Attendees

<u>Name</u>	<u>Organization</u>
Ed Thomas	Office of Engineering and Technology
Donald Abelson	International Bureau
David Furth	Wireless Bureau
Tom Stanley	Wireless Bureau
Ron Netro	Wireless Bureau
Richard Engelman	International Bureau
Rod Porter	International Bureau
Bruce Romano	Office of Engineering and Technology
Jennifer Gilsenan	International Bureau
Kathryn Medley	International Bureau
Shabnam Javid	International Bureau
Jackie Ruff	International Bureau
Jim Schlichting	Office of Engineering and Technology
Bruce Franca	Office of Engineering and Technology
Steve Duall	International Bureau
Don Brittingham	Verizon Communications, Inc.
Aaron Dagen	Verizon Communications, Inc.
Henry M. Ruiz	Verizon Communications, Inc.
Neale Hightower	BellSouth Corp.
Charles Featherstun	BellSouth Corp.
William Wiltshire	Counsel for AT&T Wireless, Inc.
Mary O'Connor	Counsel for WCAI
Lon Levin	XM Satellite Radio, Inc.
Craig Wadin	XM Satellite Radio, Inc.
Bruce Jacobs	Counsel for XM Satellite Radio, Inc.
Robert Briskman	Sirius Satellite Radio, Inc.
Patrick Donnelly	Sirius Satellite Radio, Inc.
Carl Frank	Counsel for Sirius Satellite Radio, Inc.

WCS / SDARS Discussions

Establishment of Rules for SDARS Terrestrial Repeaters
IB Docket No. 95-91

**Presentation to FCC's International Bureau,
Wireless Telecommunications Bureau, and
Office of Engineering & Technology**

11/12/2003

Agenda

- Objectives of discussions
- Possible limits on SDARS repeaters to eliminate and/or mitigate interference
- Application of rules to different situations
- Potential use of filters
- Other considerations

Objectives

- Allow both WCS and SDARS to deploy without harmful interference
- Develop a better understanding of each other's technology and deployments
- Develop a better understanding of the interaction between SDARS terrestrial repeaters and WCS receivers

**Possible Limits on SDARS Repeaters
to Eliminate and/or Mitigate Interference**

- EIRP limits
- PFD limits
- Limitations on WCS area impacted
 - Percentage of geographic area
 - Percentage of households
 - Golden zones

Defining the Potential Impact on WCS

- Impact will vary depending on several factors
 - Transmit power and antenna characteristics of SDARS repeater
 - Operating characteristics of the WCS CPE receiver
 - Location of SDARS repeaters and WCS base stations and CPE
- Primary overload area
 - Area within which model predicts that blockage would occur regardless of WCS deployment scenario and antenna orientation.
- Secondary overload area
 - Area within which model predicts blockage would occur when repeater is within main beam of WCS CPE antenna.
- Intermodulation distortion (IMD) area
 - Created by a combination of SDARS signals

Application of Rules

- Consider variations in the limits depending on repeater type
 - Omnidirectional vs. directional
 - “Existing” vs. “new” vs. “substitute” repeater
 - “Existing” vs. “new” market

WCS Filters

- Consider potential use of filters for WCS receivers
 - Technical and economic viability
 - Impact on modeling of potential interference
 - Allocation of expense for development/use

Other Considerations

- Parity between two SDARS licensees
- Transition period for making changes
- Notice/coordination requirements
- Reciprocity between WCS and SDARS
- Relaxation of limits on WCS